# Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

Date filed: February 13, 2018

Name of company covered by this certification: TCS Communication Solutions, LLC

Form 499 Filer ID: 826928

Name of signatory: Bruce W. Hollis

Title of signatory: Managing Director (Officer)

I, Bruce W. Hollis, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by the company at state commissions, the court system, or the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints during the period covered by this certification concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

TCS/Communication Solutions, LLC

Bruce W. Hollis Managing Director 13085 Lewistown Rd.

Oueen Anne, MD 21657

Attachment: Accompanying Statement explaining CPNI procedures.

### Annual 47 C.F.R. § 64.2010(e) CPNI Certification

#### **EB Docket 06-36**

#### **Attachment 1: Statement Concerning Company Procedures**

TCS Communication Solutions, LLC ("TCS") is a pre-paid calling card provider with little or no access to its customers' Customer Proprietary Network Information ("CPNI"). TCS does not use CPNI for marketing purposes. TCS has adopted a confidentiality policy that addresses proper handling and use of CPNI, and has distributed that policy to all of its employees.

Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year.